

EXHIBIT T

**Redacted Version of
Document Sought to be Sealed**

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

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CHASOM BROWN, et al.,)
on behalf of themselves and)
all others similarly)
situated,)

Plaintiffs,) Case No.

) 5:20-cv-03664-LHK

vs.)

GOOGLE LLC,)

Defendant.)

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Videotaped Zoom Deposition of
LORRAINE TWOHILL
Highly Confidential
Friday, May 6, 2022

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Katy E. Schmidt
RPR, RMR, CRR, CSR 13096
Veritext Job No.: 5211818

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1 shared in that meeting would have been -- I don't 11:58
2 remember it in detail. I don't remember the research. 11:58
3 But I believe that there were some slides that day 11:58
4 talking about research or summarizing research the 11:58
5 team had done. 11:58

6 Q. And would that research that the team had 11:58
7 done indicate that some consumers were confused about 11:58
8 the use of the icon on the slide screen? 11:58

9 MR. SCHAPIRO: Objection. Vague. 11:58
10 Ambiguous. 11:58

11 THE WITNESS: And I really don't remember. 11:58
12 I'd need to see the research. 11:58

13 BY MR. YANCHUNIS:

14 Q. And in connection with maintenance, Sundar 11:58
15 didn't want to put incognito under the spotlight. 11:58

16 Do you know what that referenced? 11:58

17 A. Again, I'm going from memory, and I don't 11:59
18 remember all the details of that conversation. But I 11:59
19 do know we were preparing for I/O, which is our big 11:59
20 product event, which is -- was a few weeks later, and 11:59
21 were typically only putting a spotlight on new 11:59
22 announcements and new features at I/O. And we were 11:59
23 rolling incognito out to search, maps, and I think it 11:59
24 was YouTube. 11:59

25 And so that was our focus. And we did 11:59

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1 actually, in fact, talk about incognito mode in Chrome 11:59
2 there too. 11:59
3 Q. Okay. And so Sundar, as used in this 11:59
4 e-mail, refers to Sundar Pichai; correct? 11:59
5 A. Correct. 11:59
6 Q. And what is the I slash O? What does that 11:59
7 reference? 11:59
8 A. That's the event I just mentioned, I/O. 11:59
9 It's an event we have once a year. It's actually next 11:59
10 week. It's an event we have once a year where we talk 11:59
11 about product updates. It's usually about 90 minutes 11:59
12 long. It's an important moment for the company. 11:59
13 Q. Okay. And is that given to the general 12:00
14 public or to investors or just internally to employees 12:00
15 at the company? 12:00
16 A. It's -- the main audience are developers and 12:00
17 some press attend too. 12:00
18 Q. Okay. And these developers are individuals 12:00
19 or entities outside of Google's employ? 12:00
20 A. Yes, they are. 12:00
21 Q. Are you familiar with an individual by the 12:00
22 name of Tom Oliveri? 12:00
23 A. Yes, I am. 12:00
24 Q. And what position did Mr. Oliveri hold back 12:00
25 on April 20th -- or excuse me -- April 30th of 2019? 12:00

1 me. 01:47

2 A. I found it. 01:47

3 Q. Okay. Would you read aloud the first 01:47

4 sentence after "Make Incognito Mode Truly Private"? 01:47

5 A. So the document says: 01:47

6 [REDACTED] 01:47

7 [REDACTED] 01:47

8 [REDACTED] 01:47

9 [REDACTED] 01:47

10 [REDACTED] 01:47

11 [REDACTED] 01:47

12 [REDACTED] 01:47

13 Q. Has Google implemented these changes to make 01:47

14 incognito truly private? 01:47

15 MR. SCHAPIRO: Objection. Foundation. 01:47

16 THE WITNESS: To be honest, I'm not sure. I 01:48

17 believe we've done the default turning cookie blocking 01:48

18 on, as I think it's on that tab page you spoke about 01:48

19 earlier. And I think you can use the free VPN through 01:48

20 Google one account. I'm not -- I'm not an expert on 01:48

21 that, though. 01:48

22 BY MR. YANCHUNIS: 01:48

23 Q. Has Google implemented any of these changes 01:48

24 to Chrome Incognito Mode? 01:48

25 MR. SCHAPIRO: Objection. Foundation. 01:48

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1 "Safer with Google" narrative across our products. 02:21

2 And part of that framework was to build products from 02:21

3 the get-go with privacy built in related to your 02:21

4 Google account, and all of that work. 02:21

5 And that was what I was referencing. 02:21

6 Q. And did that include pushing the PAs to help 02:21

7 with changes to Chrome Incognito Mode to make it truly 02:21

8 private? 02:21

9 A. I really don't think we ever discussed 02:21

10 incognito mode in that context. 02:21

11 The work I've done with Luiz and Rahul and 02:21

12 Jen was all around the user settings. And especially 02:21

13 the work we're launching at I/O, which was auto 02:21

14 delete, location history, user settings across search 02:21

15 history, video history. And really all of that work 02:22

16 that we've done over the years. 02:22

17 Q. Do you know if Mr. Pichai did it as you 02:22

18 asked him to? 02:22

19 A. I have no idea. 02:22

20 Q. Let me direct your attention to Exhibit 14. 02:22

21 It's a document which contains a Bates range of 02:22

22 4739271, through 4739316. And I only have a few 02:22

23 questions about a few pages in that document. 02:22

24 A. Okay. Just opening it. 02:22

25 /// 02:23